

ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT AT
HAZARDOUS WASTE SITES

TES IV
CONTRACT NO. 68-01-7351
WORK ASSIGNMENT NO. 505

LAND DISPOSAL RESTRICTION INSPECTIONS

EPA REGION V

THE NUTRASWEET COMPANY
2600 BOND STREET
UNIVERSITY PARK, ILLINOIS 60466

JACOBS ENGINEERING GROUP INC.
PROJECT NO. 05-B505-00

PREPARED BY:

METCALF & EDDY, INC.
85 W. Algonquin Road, Suite 500
Arlington Heights, IL 60005

EPA Identification Number: ILD 980793020

Facility Representative: R. Heinz, Environmental Coordinator

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1.0 Introduction

A Land Disposal Restriction (LDR) inspection was conducted for the Nutrasweet Company, 2600 Bond Street, University Park, Illinois, on December 11, 1987. This facility was included in Work Assignment Number 505 issued by the U.S. EPA under the TES IV contract. The inspection was conducted under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended.

This investigation was required to assess the level of compliance to the Land Disposal Restrictions promulgated November 8, 1986. These restrictions prohibit the land disposal of F001-F005 waste solvents. The purpose of this investigation was to review only the management practices of those particular waste solvents.

The purpose of this report is to supply the EPA with information which they will use to make a determination of compliance or violation with respect to the LDR. This report, documentation from the facility and site photographs will be utilized for the determination.

2.0 Participants

The inspection was conducted by Carol Meyer and Margaret Murdock, Metcalf & Eddy (TES IV contractors) subcontractors to Jacobs Engineering Group, Inc.

Also present for all or part of the inspection were Andrew J. Quick, Manager, Environmental Engineering and Richard T. Heinz, Environmental Coordinator, both of The Nutrasweet Company.

3.0 Inspection Procedures

Upon arrival at the facility, the TES IV contractors met with Mr. Heinz. The purpose and format of the LDR inspection was explained to Mr. Heinz. It was also explained that the facility was entitled to declare certain information as Confidential Business Information (CBI). Mr. Heinz requested that certain process information be declared CBI. It was agreed that the information stamped confidential by Mr. Heinz be handled as CBI. The TES IV contractors signed the secrecy agreement in Attachment I.

4.0 Facility Description

The Nutrasweet Company in University Park, Illinois, manufactures Nutrasweet brand sweetener.

4.1 RCRA Status and F-solvent Waste Activities

The facility operates under U.S. EPA generator ID number ILD 980793020. In the manufacture of Nutrasweet the facility generates five waste streams. In addition, the facility laboratory generates lab wastes.

The wastes that contain spent solvents prohibited from land disposal are solid F005 waste and lab waste containing F005 and F003 constituents. The solid F005 waste is generated by the filtration of an organic-water emulsion. The solid waste contains F005 constituents at concentrations greater than the treatment standards. The lab wastes contain F005 and F003 constituents at concentrations exceeding the treatment standards. These two waste streams are stored in 55 gallon drums in an on-site temporary storage area. They are incinerated off-site at LWD in Kentucky.

The facility generates approximately 5,000 gallons per day of a spent solvent-water mixture waste stream. This stream is generated by an organic-water separation of a manufacturing by-product. The water is re-used in the process, while the organic phase is considered waste and removed from the process for off-site treatment. This solvent-water mixture contains a F005 constituent in concentrations that exceed the treatment standards. However, this waste contains less than one percent total F001-F005 constituents. Therefore, it is subject to the nationwide variance that allows for land disposal of such wastes until November 8, 1988. This waste is stored in an 8,000 gallon storage tank as it is generated. Each day, a tank truck removes approximately 5,000 gallons for off-site treatment. This waste is sent primarily to Environmental Waste Control (EWC) in Michigan. It is often sent to Chem Clear in Illinois and sometimes to CID in Illinois. All three treatment facilities have been notified that this waste stream is subject to the nationwide variance.

Furthermore, there are three waste streams generated from the recovery of raw materials and product from the aqueous wastewater stream. These wastes have been determined to be non-hazardous by the Illinois EPA. These three streams are mixed and shipped off-site to Century Oil or Miles Lab.

Finally, methanol is used as a reactant in the manufacture of Nutrasweet (L-aspartyl L-phenylalanine methyl ester). Excess methanol is recovered, thus generating a small amount of still bottoms. This methanol bottoms waste is sent to the public utility, Consumers Illinois Water Company, University Park, Illinois.

4.2 Waste Analysis

The Nutrasweet Company has had extensive analysis performed on the spent solvent-water mixture waste stream to show that it is indeed subject to the nationwide variance. Please refer to Attachment II for the most recent data. The only spent solvent is a F005 constituent and its concentration is less than one percent. The methanol in this stream is neither spent or used as a solvent. Methanol is reactant in the production of L-aspartyl L-phenylalanine methyl ester.

The solid F005 waste and the lab wastes (F005/F003) have not undergone extensive analysis. However, the facility classifies the wastes through knowledge of the processes and lab activities.

5.0 Manifests

The following is a description of the handling of F-solvent waste from the point of on-site generation to shipment of off-site for treatment. The manifests for shipment of F-solvent waste were inspected for the following information; the amount of waste generated, the frequency of off-site shipments for treatment, the proper classification of the F-solvent waste, and the inclusion of the required notifications and/or certifications.

The manifests inspected included those for the shipment of F-solvent waste from on-site to EWC, Chem Clear, CID, LWD and Safety-Kleen for various off-site treatment technologies.

The manifests for shipments of the F005 solvent-water mixture to EWC, CID and Chem Clear were properly completed. The waste was identified correctly as waste code F005. Approximately 5,000 gallons/day is shipped off-site. This indicates that the 90 day storage time is not exceeded.

Furthermore, even though all three treatment facilities have been notified by Nutrasweet concerning the variance until November 8, 1988, Nutrasweet has included a notification on all manifests to CID and Chem Clear. When the waste was initially sent to EWC, Nutrasweet included a notification on every manifest, but has discontinued that procedure.

The manifests for shipments of the drummed F005 and F005/F003 wastes to LWD do not include the required generator notifications. The TES IV contractors discussed the 40 CFR 268.7 requirements with Mr. Heinz. Mr. Heinz stated that they would include a notification with the very next shipment.

Finally, Nutrasweet had sent several 5,000 gallon shipments of the F005 spent solvent-water mixture to Safety-Kleen in July, 1987. The purpose was to see if Safety-Kleen could recover the F005 constituents in this stream. Again, the required generator notifications had not been included with the manifests. Mr. Heinz stated that any future shipments to Safety-Kleen would include the notifications.

Please refer to Attachment II for examples of the manifests for shipments of the various wastes to the different contractors. Also, please refer to the summary of the off-site waste shipments made by Nutrasweet for November 1986 through the date of this inspection.

6.0 Visual Inspection

A visual inspection of the storage areas of the Nutrasweet facility was conducted. Photographs were taken by the TES IV contractors. It was agreed that Nutrasweet would develop the film and review for proprietary information prior to release to the contractors. The photographs are included in Attachment IV.

The 8,000 gallon storage tank used to store the F005 solvent-water waste stream has a working capacity of 7,200 gallons. Five thousand gallons of this waste is generated and shipped off-site daily. The tank was properly labeled, in good condition and held in a full containment diked area.

The drum storage area is located outside and is used for the temporary storage of drummed waste that is shipped off-site for treatment. The area is secured by a fence and locked gate. The concrete pad is curbed and the drums are stored on wooden pallets. All the drums were properly labeled with the dates and waste identification. They were stored closed and in good condition. No drum had exceeded the 90 day storage limit.

7.0 Findings and Conclusions

The RCRA Land Disposal Restriction Inspection Checklist was completed for those parts applicable to the generation of F-solvent wastes at The Nutrasweet Company.

Sections of the checklist that are not applicable are so marked. The checklist is included as Attachment V to this report.

The F005 solvent-water mixture has been declared, by Nutrasweet, to be subject to the nationwide variance that allows for the land disposal of wastes containing less than one percent total F001-F005 constituents until November 8, 1988. The facility has notified all three treatment facilities that this waste is indeed subject to the nationwide variance. For CID and Chem Clear, the facility includes a notification of the variance with each and every shipment.

The F005 and F005/F003 wastes generated at The Nutrasweet Company that are not subject to the nationwide variance are drummed, stored temporarily and shipped off-site for incineration. The facility had not included the required generator notifications with the manifests for shipments of these wastes. According to Mr. Heinz, the facility had begun to use a standard notification form, to comply with 40 CFR 268.7, shortly after this inspection.

Attachment I
Standard Secrecy Agreement

UNIVERSITY PARK

Representatives of your company need to visit The NutraSweet Company facility in University Park, Illinois, to (specify purpose) _____ . While at the facility, confidential information concerning the operations of the facility will become apparent by observation or will specifically be disclosed to your representatives.

The foregoing restriction on disclosure shall not apply to the extent that any such information:

- Your acceptance of the foregoing will be indicated by your signature and returning the duplicate copy of the agreement to The NutraSweet Company.

Carol L. Meyer
Your Signature

Title ENVIRC. COORD.

Attachment II

Waste Analysis

NUTRASWEETANALYSIS REPORT

Samples Collected By:	Client personnel					
Gabriel Log No.	7557-87	7640-87	7693-87	7760-87	7761-87	7762-87
Sample Description	Raffinate	Raffinate	Raffinate	Raffinate	Raffinate	Raffinate
Sample Date:	9/22/87	9/23/87	9/24/87	9/25/87	9/26/87	9/27/87
Date Received:	<u>9/23/87</u>	<u>9/23/87</u>	<u>9/24/87</u>	<u>9/28/87</u>	<u>9/28/87</u>	<u>9/28/87</u>

Parameters

5-Day BOD	100,550	60,300	109,510	80,200	55,400	65,600
Suspended Solids	624	433	1,178	619	631	451
Dissolved Solids	262,062	249,268	266,164	264,720	272,644	194,300
Chloride	1,753	2,450	1,634	2,860	2,055	3,400
Sulfate	9,200	9,300	10,500	9,500	8,600	8,100
Toluene	620	660	1,900	360	320	420
Methanol	1.37%	1.20%	1.62%	1.20%	1.30%	1.43%

Analyses Certified by John Kanow Date 10/20/87

Results, except as noted, are expressed in ug/g (solid or semisolid phase), or mg/L (liquid phase).

Analyses performed according to Standard Methods, latest edition; USEPA Test Methods for Evaluating Solid Wastes, SW-846, 1982 and ASTM Methods.

Attachment III

Manifests



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐

Required under authority of Act 64, P.A.

Required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1969.

Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969.

Please print or type.

Form Approved OMB No. 2000-0404 Expires 7-31-86

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

11D 980793020

Manifest
Document No.

145278

2. Page 1

of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

THE NUTRASKET COMPANY
2600 BOND STREET
UNIVERSITY PARK, IL 60466

State Manifest Document Number

MI 0845298

4. Generator's Phone (312) 534-1030

State Generator's ID

1970720002

5. Transporter 1 Company Name JUSTAK BROS.

6. US EPA ID Number

11D 000780320

State Transporter's ID

0325

7. Transporter 2 Company Name

8. US EPA ID Number

State Transporter's ID

Transporter's Phone

9. Designated Facility Name and Site Address

ENVIRONMENTAL WASTE CONTROL
27140 PRINCETON AVE.
DEXTER, MI 48141

10. US EPA ID Number

11D 057002602

State Facility's ID

Facility's Phone

313-561-1400

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste
No.

W/H

a. X WASTE FLAMMABLE LIQUID, NOS. UN1993

001 TT

05250

G

P005

M

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes
Listed Above

a/ /

b/ /

c/ /

d/ /

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b)
of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practica-
ble and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the
environment.

Printed/Typed Name

Signature

Date

Month Day Year

11/17/97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

11/14/97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
item 19.

Printed/Typed Name

Signature

Date

Month Day Year

11/17/97

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 1-800-292-4706 AND THE NATIONAL RMP 003E
CENTER AT 1-800-424-9802 24 HOURS PER DAY.

GENERATOR

TRANSPORTER

OWNER



Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD 980793020	Manifest Document No. 00787	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.
3. Generator's Name and Mailing Address THE NUTRASWEET COMPANY 2600 BOND STREET UNIVERSITY PARK, IL 60466					Illinois Manifest Document Number ML 1685783
4. Generator's Phone (312) 534-1030					Illinois Generator's ID D 1970720002
5. Transporter 1 Company Name MID AMERICA		6. US EPA ID Number ILT 180010365			Illinois Transporter's ID D (312) 841-7020
7. Transporter 2 Company Name		8. US EPA ID Number			Illinois Transporter's ID F()
9. Designated Facility Name and Site Address ROCKSON ENVIROSYSTEMS SAFETY KLEEN ENVIROSYSTEMS 633 E. 138TH STREET DOLTON, IL 60419		10. US EPA ID Number ILD 980613913			Illinois Facility's ID D 0310690006
				Facility's Phone (312) 849-4850	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	L Waste No.
a. HM RQ WASTE TOLUENE FLAMMABLE LIQUID UN 1294		001 TT	255.00	1	EPA HW Number X 0051 Authorization Number 30381
b.					EPA HW Number X Authorization Number
c.					EPA HW Number X Authorization Number
d.					EPA HW Number X Authorization Number
15. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.					
Printed/Typed Name MARIE MAYNOR		Signature Marie Maynor		Date 07/07/87	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name R.H. Glick		Signature R.H. Glick	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
19. Discrepancy Indication Space Approved per Rose Salas 7-9-87 (me) actual gallons 4871 Added manifest document #					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.		Printed/Typed Name Mike Downey		Signature Mike Downey	
				Date 07/10/87	

JNOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1963, Chapter 111 1/2, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

DNR

MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1989.Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1989.

Please print or type

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

IID 980793020

Manifest

Document No.

451719

2. Page 1

of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

THE BUTRAPKEY COMPANY
2600 BOND STREET
UNIVERSITY PARK, IL 60466

State Manifest Document Number

MI 0945194

4. Generator's Phone (312) 534-1030

State Generator's ID

1878724002

5. Transporter 1 Company Name JUSTAK BROS.

6. US EPA ID Number

IID 000780320

State Transporter's ID

8325

7. Transporter 2 Company Name

8. US EPA ID Number

Transporter's Phone 800-348-4044

State Transporter's ID

Transporter's Phone

9. Designated Facility Name and Site Address

ENVIRONMENTAL WASTE CONTROL
27140 PRINCETON AVE.
DEXTER, MI 48141

10. US EPA ID Number

IID 057002602

State Facility's ID

State Facility's Phone

313-361-1400

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

No.

Type

13. Total

Quantity

14. Unit

Wt/Vol

1. Waste

No.

N/H

a. X WASTE FLAMMABLE LIQUID, NOS. UN1993

001

TT

45250

G

F003

E

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes
Listed Above

a/ /

b/ /

c/ /

d/ /

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b)
of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practica-
ble and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the
environment.

Printed/Typed Name

JOE PODRAZA

Signature

Joe Podraza

Date

Month Day Year

10/12/18

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Larry Jensen

Signature

Larry Jensen

Date

Month Day Year

10/12/18

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

10/12/18

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
item 19.

Printed/Typed Name

Joyce Arakelian

Signature

Joyce Arakelian

Date

Month Day Year

10/12/18



Please print or type.

(Form designed for use on site (12-pitch typewriter.)

EPA Form 8700-22 (3-84)

Form Approved OMB No. 2050-0039. Expires 9-30-88

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

ILD 980793020

Manifest
Document No.2. Page 2
of 2Information in the shaded areas is not
required by Federal law, but is required
by Illinois law.

3. Generator's Name and Mailing Address

The NutraSweet Company
2600 Bond St., University Park, Ill. 60466

4. Generator's Phone (312) 534-1030

5. Transporter 1 Company Name

Leader Industries, Inc.

6. US EPA ID Number

IND094558004

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

LWD, Inc.

P. O. Box 327

Calvert City, Ky. 42029

10. US EPA ID Number

KYD088438817

Illinois Manifest Document Number

L 1732332 CONT.

Illinois
Generator's

ID 1970720005

Illinois Transporter's ID SWH 0085

219 762-8588 transporter's Phone

Illinois Transporter's ID

F1) Transporter's Phone

Illinois
Facility's

ID 9211570001

Facility's Phone

502) 395-8313

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13.
Total
Quantity14.
Unit
Wt/Vol15.
Waste No.

HM

a.

ER85, UN1170, 55 gallon drums
Waste Alcohol, non-chlorinated

6

DF

330

1

EPA HW Number

XD001

Authorization Number

b.

EX65, UN1170, 55 ~~XXXXXX~~ gallon drums
L-Phe Mother Liquor *Corrosive liq.*

2

DF

110

1

EPA HW Number

XD002

Authorization Number

c.

EX62, UN2789, 55 gallon drums
Acetic Acid Liquid *Corrosive liq.*

7

DF

385

1

EPA HW Number

XD002

Authorization Number

d.

EX64, UN1170, 55 gallon drums
APM HCL Mother Liquor *Corrosive liq.*

6

DF

330

1

EPA HW Number

XD002

Authorization Number

1. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
in Item #14

1 = Gallons

2 = Cubic Yards

T06 T07

15. Special Handling Instructions and Additional Information

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Printed/Typed Name

Gary N. Pagen

Signature

Gary N. Pagen

Date

Month Day Year

04 13 87

Date

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

MARK BELL

Signature

Mark Bell

Month Day Year

04 13 87

Date

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

Items changed per Pagen KAW 4/15/87

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Steve York

Signature

Steve York

Date

Month Day Year

04 14 87

217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY

PART - 4 TRANSPORTER

PART - 5 IEPA PART - 6 GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

Is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management

Please print or type

(Form designed for use on 2-pitch typewriter.)

EPA Form 8700-22 (3-8)

Form Approved

Expires 6-30-88

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
DocumentInformation provided on this form is not
legally required by federal law, but is required
by state law.

ILD 980793020

3. Generator's Name and Mailing Address

The NutraSweet Company
2600 Bond St., University Park, Ill. 60466

4. Generator's Phone (312) 534-1030

5. Transporter 1 Company Name

6. US EPA ID Number

Leader Industries, Inc.

IND094558004

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

10. US EPA ID Number

LWD, Inc.
P.O. Box 327
Calvert City Ky. 42029

1 KYD088438817

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total
Quantity14. Unit
Wt/Vol

15. Waste No.

HM

No.

Type

a. Non-Hazardous Powders, EC85
NH UN/NA, 16 gallon drums

14

DF

224

1

EPA Hazard Number
NAb. DG95, UN1294, 16 gallon drums
X Toluene-Methanol Lab Packs

60

DF

960

1

EPA HW Number
X F0051
Authorization Numberc. DP69, UN1294, 30 gallon drums
X Toluene-Methanol Solids

27

DF

810

1

EPA HW Number
X F0051
Authorization Numberd. DC12, UN1993, 55 gallon drums
X Methanol Flammable Liquid

10

DF

550

1

EPA HW Number
X F0031
Authorization Number

Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above
in Item #14

1 = Gallons

2 = Cubic Yards

T06 T07

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

Signature

Gary N. Paquin

Gary N. Paquin

Date

Month Day Year

04 13 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Mark Ball

Mark Ball

Month Day Year

04 13 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

04 13 87

19. Discrepancy Indication Space

Change made in line 12a (From 12 to 14) and 12b (From 62 to 60)
made Gary Paquin.

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Steve York

Steve York

Date

Month Day Year

04 14 87

ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. 06

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111W, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

DNR

MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐required under authority of Act 64, P.A.
1979, as amended and Act 136, P.A.
1969.Failure to file is punishable under
section 299.548 MCL or Section 10 of
Act 136, P.A. 1969.

Please print or type

Form Approved OMB No. 2000-0404 Expires 7-31-85

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

MI 10 92 0 79 30 2 0 46382

Manifest
Document No.

2. Page 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

The Nutrasweet Company

2600 Bond Street

University Park, Illinois 60466

4. Generator's Phone (312) 534-1630

A. State Manifest Document Number

MI 0906582

B. State Generator's ID

1970720002

C. State Transporter's ID

0325

D. Transporter's Phone 800-348-4044

5. Transporter 1 Company Name

Justak Brothers

6. US EPA ID Number

MI 10 0 007 80 3 2 0

7. Transporter 2 Company Name

8. US EPA ID Number

1 1 1 1 1 1 1 1 1 1

9. Designated Facility Name and Site Address

Environmental Waste Control

27140 Princeton Avenue

Inkster, Michigan 48141

10. US EPA ID Number

MI 10 5 7 00 26 02

G. State Facility's ID

9261633004

H. Facility's Phone

313-561-1400

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

No. Type

13. Total

Quantity

14. Unit

W/Vol

I. Waste

No.

N/H

a.

b.

c.

d.

X Waste, Flammable Liquid, NOS

6 0 1T 16 000

F 0 05 H

UN1993

J. Additional Descriptions for Materials Listed Above

This waste material contains less and is P001 to
P005 solvents and qualifies for exemption from the
landfill disposal ban of Section 3004(e) of the
Hazardous & Solid Waste Management of 1981, effective 11-9-86.K. Handling Codes for Wastes
Listed Above

a/ /

b/ /

c/ /

d/ /

15. Special Handling Instructions and Additional Information - This notification is true, accurate & compl

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b)
of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practica-
ble and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the
environment.

Printed/Typed Name

JOE POORAZA

Signature

Joe Pooraza

Date

Month Day Year

11/21/85

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

11/21/85

18. Transporter 2 Acknowledgement or Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

11/21/85

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
item 19.

Printed/Typed Name

Signature

Date

Month Day Year

11/21/85

Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. LD 980793020		Manifest Document No. 133351		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address		THE NUTRASWEET CO. 2600 BOND ST. UNIVERSITY PARK, IL. 60466				Illinois Manifest Document Number IL 1733351			
4. Generator's Phone (312) 534-1030						Illinois Generator's ID 1970720002			
5. Transporter 1 Company Name JUSTAK BROS.		6. US EPA ID Number ND 000780320				Illinois Transporter's ID 0325		Transporter's Phone 348-4044	
7. Transporter 2 Company Name		8. US EPA ID Number				Illinois Transporter's ID		Transporter's Phone	
9. Designated Facility Name and Site Address CHEM CLEAR, INC. 11800 S. STONEY ISLAND AVE. CHICAGO, IL. 60617		10. US EPA ID Number ILD 000608471				Illinois Facility's ID 0316000051		Facility's Phone 646-6202	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity		14. Unit Unit Wt/Vol	
a. X HAZARDOUS WASTE LIQUID NOS. ORM-E NA9189				001 TT		GAL 5000		Waste No. X005 Authorization Number 930389	
b.								EPA HW Number X Authorization Number	
c.								EPA HW Number X Authorization Number	
d.								EPA HW Number X Authorization Number	
Additional Descriptions for Materials Listed Above: NOTIFICATION: This waste material contains less than 1% P001 to P005 solvents and qualifies for exemption from the landfill disposal ban of Section 3004(e) of the Hazardous & Solid Waste Amend. of 1984, eff. 11-8-86. This notification is true, accurate & complete.						K. Handling Codes for Wastes Listed Above In Item #14 1 = Gallons 2 = Cubic Yards			
15. Special Handling Instructions and Additional Information 5000 SKIMMER									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.									
Printed/Typed Name JOE PODRAZA				Signature Joe Podraza				Date Month Day Year 11 28 86	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name KEN ORR JR.				Signature Ken Orr Jr				Date Month Day Year 11 28 86	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature				Date Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name Robert Simon				Signature Robert Simon				Date Month Day Year 11 28 86	

VOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

BUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

The Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111 1/2, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Unit.

Please print or type

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved OMB No. 2000-0404 Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD 980793020		Manifest Document No. 184043		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address THE NUTRASWEET CO. 2600 BOND ST. UNIVERSITY PARK, IL. 60466		A. Illinois Manifest Document Number 1584043		B. Illinois Generator's ID 1970720002		C. Illinois Transporter's ID 0325		D. (800) 348-4044 Transporter's Phone	
4. Generator's Phone (312) 534-1030		5. Transporter 1 Company Name JUSTAK BROS.		6. US EPA ID Number IND 000780320		E. Illinois Transporter's ID		F. (800) 348-4044 Transporter's Phone	
7. Transporter 2 Company Name		8. US EPA ID Number		G. Illinois Facility's ID 0316000056		H. Facility's Phone 312, 891-1500			
9. Designated Facility Name and Site Address CHEMICAL WASTE MGMNT/C.I.D. 138TH & CALUMET EXPY. CALUMET CITY, IL. 60409		10. US EPA ID Number ILD 010284248		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	
a. HAZARDOUS WASTE LIQUID, NOS., ORM-E NA9189		b. HAZARDOUS WASTE LIQUID, NOS., ORM-E NA9189		c. HAZARDOUS WASTE LIQUID, NOS., ORM-E NA9189		d. HAZARDOUS WASTE LIQUID, NOS., ORM-E NA9189		14. Unit Wt/Vol 1	
15. Special Handling Instructions and Additional Information 5000 SKIMMER		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.		K. Handling Codes for Wastes Listed Above in Item #14 1 = Gallons 2 = Cubic Yards		17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement of Receipt of Materials	
Printed/Typed Name JOE PODRAZA		Signature <i>Joe Podraza</i>		Date 11/28/86		Printed/Typed Name KEN ORR JR.		Signature <i>Ken Orr Jr.</i>	
19. Discrepancy Indication Space		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19		Date 11/28/86		Printed/Typed Name CARL NETMAN		Signature <i>Carl Netman</i>	

ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS OUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2675

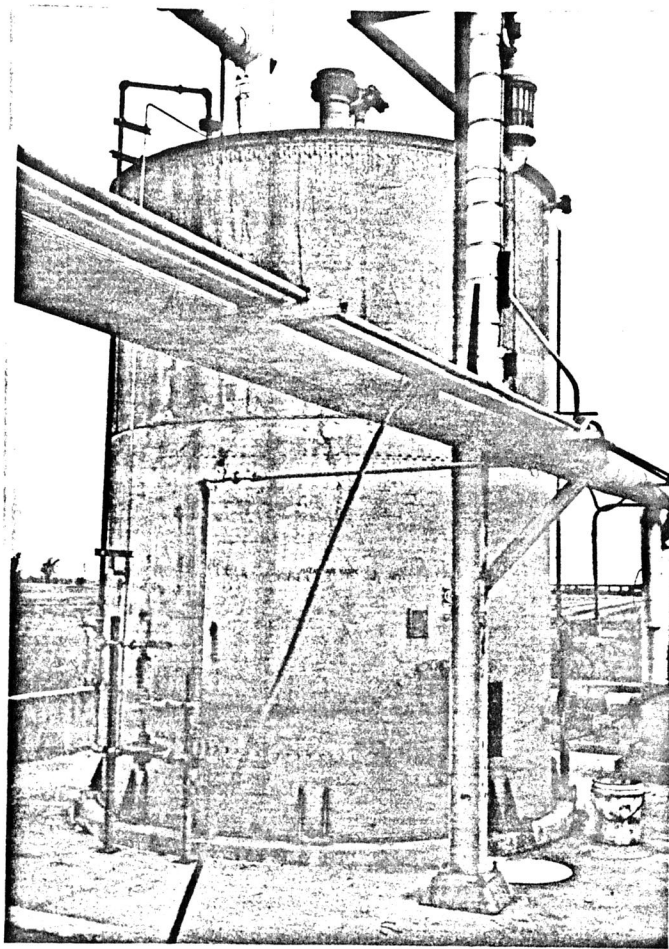
DISTRIBUTION PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

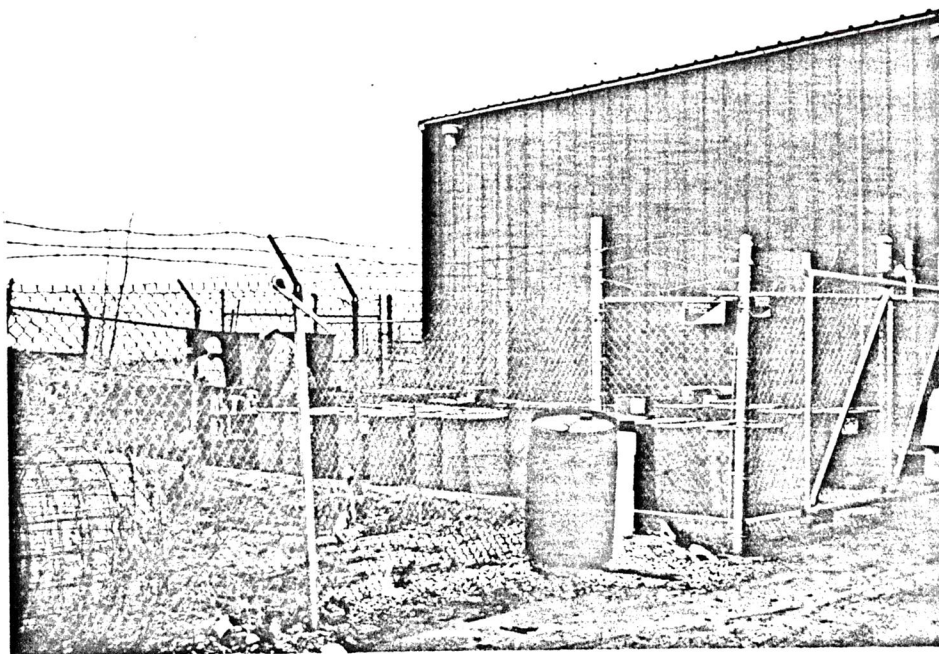
This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1963, Chapter 111 1/2, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

Attachment IV

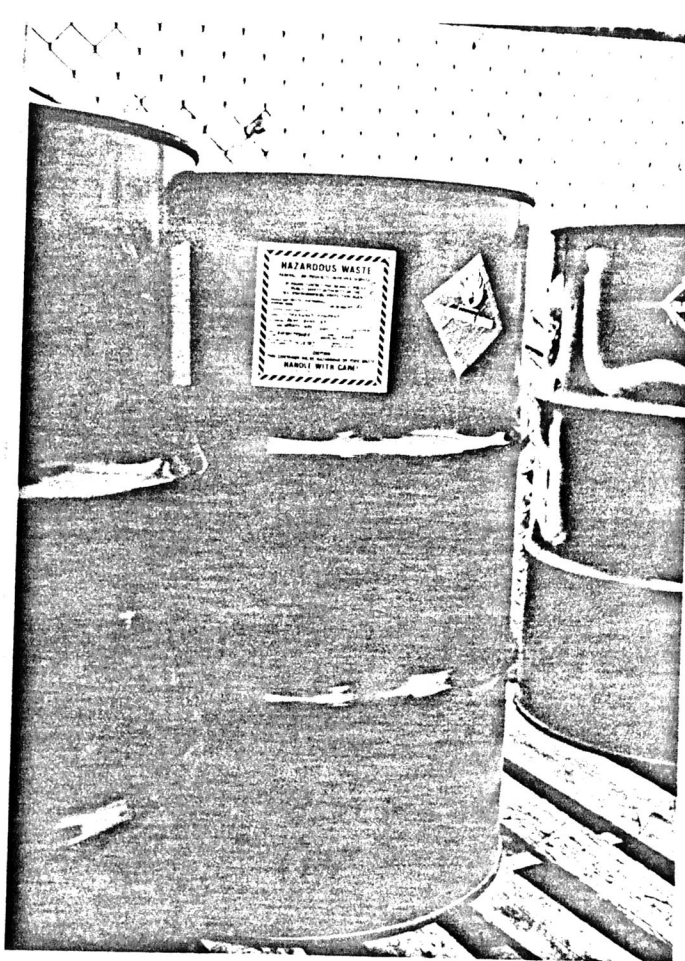
Photographs



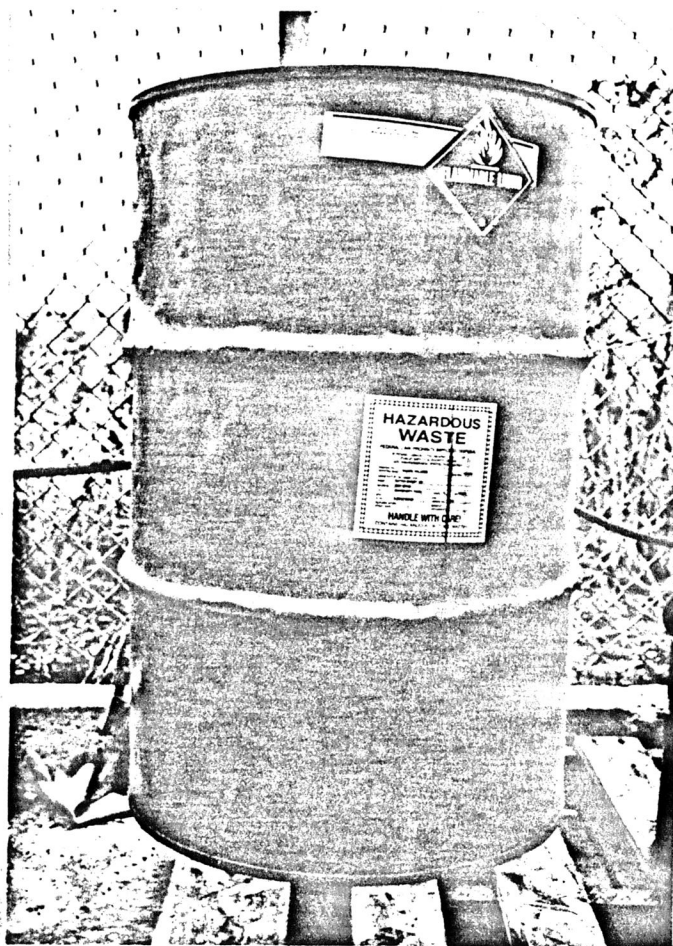
8,000 Gallon F005 Solvent Waste Storage Tank



Drum Storage Area



Hazardous Waste Label for F003 Drum



Hazardous Waste Label for F005 Drum

Attachment V

RCRA Land Disposal Restriction Inspection Checklist

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Nutrasweet Company

U.S. EPA I.D. No.: ILD 980793020

Street: 2600 BOND STREET

City: UNIVERSITY PARK State: IL Zip Code: 60466

Telephone: 312 534 1030 EXT 74 (R. HEINZ)

Operator: SAME

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Nutrasweet Company

Street: Suite 800 5215 OLD ORCHARD ROAD

City: SKOKIE State: IL Zip Code: 60077

Telephone: 312 967-4237 (A. QUICK)

Inspection Date: 12/11/87 Time: 08 - 30 Weather Conditions: 40°F, CLOUDY

	Name	Affiliation	Telephone
Inspectors:	<u>Carol Meyer</u>	<u>MGE</u>	<u>(312) 228-0900</u>
	<u>Margaret Munko</u>	<u>MGE</u>	<u>(312) 228-0900</u>

Facility Representatives: RICHARD HEINZ
Andrew Quick

	RCRA Status	F-Solvent	LDR Status California List
Generator	<u>X</u>	<u>POOS</u>	<u>NA</u>
Transporter	<u>NA</u>	<u>NA</u>	<u>/</u>
Treater	<u>/</u>	<u>/</u>	<u>/</u>
Storer	<u>/</u>	<u>/</u>	<u>/</u>
Disposer	<u>✓</u>	<u>✓</u>	<u>✓</u>

INSPECTION SUMMARY

Nutrasweet Company in University Park, IL generates F-solvent wastes in the manufacture of Nutrasweet Brand sweeteners. A F-solvent/water waste stream is generated through an organic-water separation of a byproduct stream. The water is returned to the process and the organic phase is a waste. This waste stream contains less than one percent total F001-F005 constituents, but an F005 constituent in a concentration exceeding treatment standards. Therefore, the waste is shipped off-site as an F005 waste. However, all three treatment facilities that treat this stream (CWC, Chem Clear and WLD), have been notified by Nutrasweet of the fact that the waste is indeed subject to the ^{NATIONWIDE} variance that allows for land disposal of such waste until Nov. 18, 1988. The emulsion between the organic and water phases is filtered, generating a solid F005 waste exceeding treatment standards and greater than one percent total F001-F005 constituents. This waste is drummed, stored temporarily and shipped off-site for incineration to WLD. The facility had not included the required generator notifications with the manifests for shipment.

Finally, the facility lab generates a F005/F003 waste that is drummed, packed in 55 gallon drums, stored temporarily and shipped off-site for incineration to WLD. The facility had not included the required generator notifications with the manifests for shipment.

RCRA LAND DISPOSAL RESTRICTION INSPECTION **APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	_____	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
2. F002	_____	_____	_____	_____	_____
3. F003	<u>X</u>	_____	_____	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	<u>X</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes *NOT Applicable*

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

"

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☒ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

Not Applicable

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ NoIf yes, note how this is adequate: Quantitative GC/MS analyses.

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA

If yes, specify the waste stream:

① Hazardous Waste Liquid WDS. ORH-E
NA-9189 F005
RAFFINATE

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Quantitative GC/MS analysis at least annually,
when process changes, routinely for
nationwide compliance.

2. California List Wastes
- NOT applicable

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

Toluene/methanol
ammable liquids
UN1294 F005Toluene/methanol
ammable lab packs
UN1294 F005Toluene/methanol
WDS UN1294 F005Waste Toluene
UN1294 F005
7/87) 5X @ 5000 gal.

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes X No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_____ Yes X No

This information concerns the F005 waste that is drummed and incinerated off-site.

If yes, does notification contain the following?

EPA Hazardous waste number(s) _____ Yes X No

Applicable treatment standards _____ Yes X No

Manifest number _____ Yes X No

Waste analysis data, if available _____ Yes X No

Identify off-site treatment or storage facilities: SEE items 1-5

FOR ALL OFF-SITE treatment facilities listed on manifest used for all hazardous wastes.

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

F005 41% national variance
ENVIRONMENTAL WASTE CONTROL
7140 PRUNETON AVE
KANSAS, MI 48141

F005
LAB PACKS/SOLIDS
WD, Inc.

P.O. Box 327
West City, KY 42029

5054 1% national var.

Item CLEAR

300 S. Stony Island Ave.

Hgo IL 60617

Waste Toluene F005

aFety-Kleen

33 E. 138th Street

Elton, IL 60419

⑤ F005 41% national var.
C.I.D.
138th & Calumet EXPY.
Calumet City, IL

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

THIS INFORMATION
 CONCERNS THE
 BULKED FOOD
 LIQUID WASTE
 IN RESULTS
 FROM THE
 RECYCLE-
 WATER
 SEPARATION
 PROCESS

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☒ Yes ☐ No ☐ NA

When shipping waste to Chem Ocean and CID, an exempt notification is used. However, when shipping waste to Environmental waste control, no notification is used.

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) NA

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☐ No

If yes, list types of waste treatment units and processes:

astes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
Chem. Clear, Inc 1800 Stoney Island Chicago, IL ILD 000608471	Chemical Treatment	FO05	5000 gal shipped to Chem Clear when EWC capacity is full	Hazardous waste liquid Waste flammable liquid
LWD INC P.O. Box 327 Calvert City, Ky KYD 088438817	Incineration	FO05 FO03	75- 125 drums Drums shipped every 2 months	lab pack waste solvent Toluene / methanol solids methanol flammable liquid
Environmental Waste Control 27140 Princeton INKSTER, MI 48141 MID 057002602	aerobic treatment	FO05	5000 gals shipped each day	Waste flammable liquid
Safety-Kleen EnviroSystems 633 E. 138th Street Dolton, IL 60419 ILD 980613913		FO05	5 shipments made 7/87 ① 5500 gals ② 5500 gals ③ 5464 gals ④ 5269 gals ⑤ 4175 gals.	Waste Toluene flammable liquid

CH₂Cl₂ Waste Mgmt/CFID
138th and Calumet EXPY
Calumet City, IL
60409

F005)

5000 gals
shipped when
capacity was
exceeded at
EWC

Hazardous Waste
Liquid, NOS

ILD 010284248

The NutraSweet Company

2600 Bond Street, University Park, Illinois 60466
Telephone: 312/534-1030



April 27, 1988

William E. Muno
U.S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604
RE: Response to Notice of Violation
The NutraSweet Company - EPA ID# ILD 980793020

RECEIVED
APR 27 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Dear Mr. Muno,

This letter is in response to the notice of violation which we received on April 1, 1988 (attached). The notice of violation referenced the RCRA inspection that was conducted by Metcalf and Eddy on December 11, 1987.

Attached you will find a letter sent on December 23rd to Ms. Margaret Murdock of Metcalf and Eddy which describes the corrective measures we have undertaken in response to the observed deficiencies. Also attached you will find a standard notification we send with each shipment of hazardous waste (F005) to Environmental Waste Control.

Therefore the cited deficiencies were corrected immediately after we became aware of them by implementing the above two notification procedures. If you have any further questions in this matter please call me at (312) 534-4303.

Sincerely,

Rich Heinz
Environmental Coordinator
The NutraSweet Company
University Park Plant

RH/jnm

Attachments

CC: Harry Chappel, IEPA
Glenn Savage, IEPA

RECEIVED
APR 27 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

MAR 29 1988

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R. Heinz
Nutra Sweet Company
2600 Bond Street
University Park, Illinois 60466

Re: Notice of Violation
Nutra Sweet Company
ILD 980 793 020

Dear Mr. Heinz:

On February 2, 1988, the Jacobs Engineering Group Inc., representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

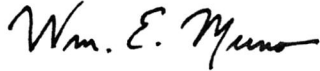
With respect to the land disposal restrictions (40 CFR 268) section of the inspection, your facility was found to be in violation of the following:

Failure to notify in writing for each shipment of F-solvent wastes the applicable treatment standard, U.S. EPA hazardous waste number, manifest number, and waste analysis data, if available as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Gertrud Matuschkovitz of my staff at (312) 353-7921.

Sincerely yours,

A handwritten signature in cursive script, reading "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA



December 23, 1987

Ms. Margaret Murdock
Metcalf and Eddy
85 West Algonquin Road
Suite 500
Arlington Heights, Illinois 60005-4422

RE: The NutraSweet Company
University Park Plant

Dear Ms. Murdock:

During your RCRA inspection on December 11, 1987 of the above referenced facility, Rich Heinz and I committed to provide additional information if available regarding whether notifications specified in 40CFR267(a)(1) were made to the waste treatment facilities that treated our solvent wastes (> 1% concentration F005 wastes).

We have determined that these notifications were inadvertently not sent with the hazardous waste manifests to LWD, a hazardous waste incinerator, and Safety Kleen, a hazardous waste reclaimer. We corrected this situation immediately following your inspection and are currently utilizing a standard notification form (attached).

We also received from Safety Kleen confirmation that all solids or residuals associated with reclamation of our wastes were incinerated prior to land disposal.

In addition, we developed and reviewed for confidentiality the photographs you took during the inspection of the hazardous waste container and tank storage areas. We have determined that no confidential information was disclosed in the photographs. Both the photographs and negatives are attached.

Please feel free to contact Rich Heinz (534-1030) or me (967-4237) with any additional questions.

Very truly yours,

Andrew J. Quick
Manager Environmental Engineering

AJQ:mew
Attachment
cc: R. Heinz

0846F

GENERATOR NOTIFICATION TO TREATMENT FACILITY
WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

Generator: _____ Profile #: _____

This Notification is submitted to _____ in accordance with regulations effective November 8, 1986 to be promulgated at 40 CFR Section 268.7(a)(1). 40 CFR Section 268.7(a) requires the generator to test his waste or an extract developed using the Toxicity Characteristic Leaching Procedure (TCLP) described in Appendix I of Part 268 51 Fed. Reg. 40,643, or using knowledge of the waste to determine if the waste is restricted from land disposal.

EPA Hazardous Waste No. F001, F002, F003, F004, and F005 are "restricted wastes" and banned from land disposal effective November 8, 1986, unless one or more of the following conditions apply: (1) the generator of the solvent waste is a small quantity generator, (2) the solvent waste is generated from response action taken under CERCLA or corrective action taken under RCRA, or (3) the solvent waste is a solvent-water mixture, solvent-containing sludge or solvent-contaminated solid (non-CERCLA or RCRA corrective action) containing less than 1% (10,000 ppm) total F001-F005 solvent constituents listed in Table CCEW of Section 268.41. (This Table is reprinted on the reverse side).

If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number _____
2. Corresponding Treatment Standard (see REVERSE SIDE)
3. Manifest Number associated with this shipment of waste _____
4. Waste Analysis data, where available (please attach)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

PLEASE BE SURE TO CHECK THE APPROPRIATE BOX(ES) ON THE REVERSE SIDE BEFORE SIGNING.

Signed (authorized representative of generator) _____ Title _____ Date _____

Note: A copy of this Notice must accompany each manifested load as required by 40 CFR 268.7(a)(1)

RECOMMENDED TREATMENT STANDARD

Instructions: For each solvent waste constituent present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the solvent constituents listed below, please mark the appropriate box(es) or the box labeled "All of the above" at the bottom.*

Solvent Constituent	Treatment Standard (mg/l)	
	Wastewaters	All Other Wastes
Acetone	0.05	0.59
n-Butyl Alcohol	5.0	5.0
Carbon Disulfide	1.05	4.81
Carbon Tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols	2.82	0.75
Cresylic Acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl Acetate	0.05	0.75
Ethyl Benzene	0.05	0.053
Ethyl Ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene Chloride	0.20	0.96
Methylene Chloride from Pharmaceutical Industry	12.7	0.96
Methyl Ethyl Ketone	0.05	0.75
Methyl Isobutyl Ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	0.079	0.05
1,2,2-Trichloroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15
All of the above *		

* Please note that where a generator's determination of the appropriate treatment standard is based upon his knowledge of the waste, the generator must maintain in his operating record all supporting data used to make this determination. See 51 Fed. Reg. at 40.597.

GENERATOR NOTIFICATION TO TREATMENT FACILITY
WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

Generator: The NutraSweet Company

This Notification is submitted to Environmental Waste Control in accordance with regulations effective November 8, 1986 to be promulgated at 40 CFR Section 268.7(a)(1). 40 CFR Section 268.7(a) requires the generator to test his waste or an extract developed using the Toxicity Characteristic Leaching Procedure (TCLP) described in Appendix I of Part 268 51 Fed. Reg. 40,643, or using knowledge of the waste to determine if the waste is restricted from land disposal.

EPA Hazardous Waste No. F001, F002, F003, F004, and F005 are "restricted wastes" and banned from land disposal effective November 8, 1986, unless one or more of the following conditions apply: (1) the generator of the solvent waste is a small quantity generator, (2) the solvent waste is generated from response action taken under CERCLA or corrective action taken under RCRA, or (3) the solvent waste is a solvent-water mixture, solvent-containing sludge or solvent-contaminated solid (non-CERCLA or RCRA corrective action) containing less than 1% (10,000 ppm) total F001-F005 solvent constituents listed in Table CCEW of Section 268.41. (This Table is reprinted on the reverse side).

If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number F005
2. Manifest Number associated with this shipment of waste _____

This waste material is subject to a National Variance under the Land Disposal Restrictions (40 CFR 268). The corresponding USEPA waste code includes F001, F002, F003, F004, or F005, is a solvent-water mixture, and the combined total concentration of solvent constituents identified in Table CCEW of 40CFR 268.41 is less than 1% by weight.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signed (authorized representative of generator) Title Date

Note: A copy of this Notice must accompany each manifested load as required by 40 CFR 268.7(a)(1)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

MAY 0

Mr. R. Heinz
Nutra Sweet Co.
2600 Bond Street
University Park, Illinois 60466

*Searle Food Resources
Park Forest So IL*

Re: Nutra Sweet Co.
ILD 980 793 020

Dear Mr. Heinz:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on April 27, 1988.

The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our March 29, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Gertrud Matuschkovitz of my staff at (312) 353-7921.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

CONCURRENCES

SYMBOL							
SURNAME	O.R.	gm		P.E.D.			
DATE	4/29/88	5-2-88		5-2-88			